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*Attorney for Plaintiffs*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

JESSICA MORALES, BERENISA  
CORTES PALOMINOS, DYLAN  
THOMAS, JANETTE BARRERA, and  
FRANCES HANDCOCK, Individually and  
on behalf of all others similarly situated,

Plaintiffs,

v.

VON CURTIS, INC., P.M. ADVANCED  
EDUCATION INC., PAUL MITCHELL  
ADVANCED EDUCATION LLC, WINN  
CLAYBAUGH, JOHN PAUL DEJORIA,  
JOHN PAUL MITCHELL SYSTEMS,  
PAUL MANTEA, D'ANN EVANS, ANN-  
MARIE SAFADI, PMNV LAS VEGAS,  
LLC, PMCA BAKERSFIELD, LLC,  
PMHBW LLC, and "John Does," name  
fictitious, name and number unknown,  
doing business as "Paul Mitchell The  
School,"

Defendants.

Case No. 4:13-CV-04996-SBA

**JOINT STIPULATION FOR  
ENLARGEMENT OF TIME FOR  
PLAINTIFFS TO RESPOND TO  
DEFENDANTS' MOTION TO DISMISS, FOR  
DEFENDANTS' TO REPLY TO PLAINTIFFS'  
RESPONSE TO DEFENDANTS' MOTION TO  
DISMISS, TO RESET HEARING ON MOTION  
TO DISMISS, AND TO RESCHEDULE CASE  
MANAGEMENT CONFERENCE;**

~~PROPOSED~~ ORDER

[CIVIL L.R. 6-1(b)]

Pursuant to Civil L.R. 6-1(b), Plaintiffs Jessica Morales, Berenisa Cortes Palominos,  
Dylan Thomas, Janette Barrera, and Frances Handcock ("Plaintiffs"), and Defendants Von  
Curtis, Inc., P.M. Advanced Education Inc., Paul Mitchell Advanced Education LLC, PMNV Las  
Vegas, LLC, PMCA Bakersfield, LLC, PMHBW LLC, Winn Claybaugh, John Paul DeJoria, Paul  
Mantea, D'Ann Evans, and Ann-Marie Safadi ("Defendants"), and by and through their  
undersigned counsel in the above-captioned matter, hereby stipulate as follows:



1 WHEREAS, Defendants filed a Motion to Dismiss on April 8, 2014 (Doc. No. 27);

2 WHEREAS, the hearing before the Court for the above-referenced Motion to Dismiss was  
3 set for May 13, 2014 at 1:00 p.m. in Courtroom 1 before the Honorable Sandra Brown  
4 Armstrong (Doc. No. 27);

5 WHEREAS, Plaintiffs' deadline for filing a Response in Opposition to Defendants'  
6 Motion to Dismiss is April 22, 2014;

7  
8 WHEREAS, Defendants' deadline for filing a Reply to Plaintiffs' Response in Opposition  
9 to Defendants' Motion to Dismiss is April 29, 2014;

10 WHEREAS, the Court's Order of February 19, 2014 set the date for the parties' Initial  
11 Case Management Conference for May 8, 2014 at 2:30 p.m. (Doc. No. 25);

12 WHEREAS, this Stipulation for an Enlargement of Time to Respond to Defendants'  
13 Motion to Dismiss affects the May 13, 2014 hearing on such motion as well as the May 8, 2014  
14 initial Case Management Conference date on the Court's calendar and other related deadlines. As  
15 such, the parties agree that the hearing on Defendants' Motion to Dismiss (Doc. No. 27) should  
16 be rescheduled to June 10, 2014, at 1:00 p.m., subject to the Court's availability and the Case  
17 Management Conference should be vacated and scheduled to a date which is convenient for the  
18 court but that is no earlier than 30 days after the court issues its order on the pending Motion to  
19 Dismiss (Doc. No. 27) or a responsive pleading is filed, whichever is sooner.  
20

21 IT IS HEREBY STIPULATED by and between Plaintiffs and Defendants, through their  
22 respective counsel of record, that Plaintiffs will have an extension of time to file their Response in  
23 Opposition to Defendants' Motion to Dismiss through and including May 6, 2014 and Defendants  
24 will have an extension of time to file their Reply to Plaintiffs' Response in Opposition to  
25 Defendants' Motion to Dismiss through and including May 20, 2014;  
26  
27  
28



1 IT IS ALSO HEREBY STIPULATED that, subject to the Court's availability, the hearing  
2 on Defendants' Motion to Dismiss currently set for May 13, 2014 at 1:00 p.m. be continued to a  
3 proposed date of June 10, 2013 at 1:00 p.m.;

4 IT IS ALSO HEREBY STIPULATED that the initial Case Management Conference in  
5 this matter currently set for May 8, 2014, at 2:30 p.m. be continued to a date which is convenient  
6 for the Court but that is no earlier than 30 days after the Court issues its order on the pending  
7 Motion to Dismiss (Doc. No. 27) or a responsive pleading is filed, whichever is sooner, and that  
8 the other deadlines set forth in the Court's Order Setting Initial Case Management Conference  
9 and Deadlines issued on October 25, 2013 (Doc. No. 4) be continued accordingly.

10 **IT IS SO STIPULATED.**

11 Dated: April 22, 2014

12 **LAW OFFICE OF LEON GREENBERG**  
13 By: s/ Leon Greenberg  
14 Leon Greenberg  
15 Attorney for Plaintiffs  
16 JESSICA MORALES, BERENISA  
17 CORTES PALOMINOS, DYLAN  
18 THOMAS, JANETTE BARRERA, and  
19 FRANCES HANDCOCK

20 Dated: April 22, 2014

21 **DUANE MORRIS LLP**  
22 By: s/ Julie A. Vogelzang  
23 Julie A. Vogelzang  
24 Edward M. Cramp  
25 Courtney L. Baird  
26 Attorneys for Defendants VON CURTIS,  
27 INC., P.M. ADVANCED EDUCATION  
28 INC., PAUL MITCHELL ADVANCED  
EDUCATION LLC, PMNV LAS VEGAS,  
LLC, PMCA BAKERSFIELD, LLC,  
PMHBW LLC, WINN CLAYBAUGH,  
JOHN PAUL DEJORIA, PAUL MANTEA,  
D'ANN EVANS, and ANN-MARIE  
SAFADI

26 ATTESTATION: Pursuant to Civil L.R. 5-1(i)(3), the filer attests that concurrence in the  
27 filing of this document has been obtained from each of the other signatories thereto.



**ORDER**

The Court having considered the Joint Stipulation for Enlargement for Time for Plaintiffs to Respond to Defendants' Motion to Dismiss, for Defendants' to Reply to Plaintiffs' Response to Defendants' Motion to Dismiss, to Reset Hearing on Motion to Dismiss, and to Reschedule Case Management Conference, orders as follow: the hearing on Defendants' Motion to Dismiss set for May 13, 2014 at 1:00 p.m. shall be continued to **June 10, 2014** at 1:00 p.m.; the initial Case Management Conference set for May 8, 2014, at 11:00 a.m. shall be continued to a date which is convenient for the Court but that is no earlier than 30 days after the Court issues its order on the pending Motion to Dismiss or a responsive pleading is filed and all the other deadlines set forth in the Court's Order Setting Initial Case Management Conference and Deadlines issued on October 25, 2013 (Doc. No. 4) be continued accordingly, whichever is sooner; Plaintiffs' shall have up to and including **May 6, 2014** to file and serve their Response in Opposition to Defendants' Motion to Dismiss; and Defendants' shall have up to and including **May 20, 2014** to file and serve their Reply to Plaintiffs' Response in Opposition to Defendants' Motion to Dismiss.

**PURSUANT TO STIPULATION, IT IS SO ORDERED**, except that the the Telephonic Case Management Conference, previously set for May 8, 2014, is continued to August 7, 2014, at 2:30 p.m. The parties shall meet and confer prior to the conference and shall prepare a joint Case Management Conference Statement which shall be filed no later than seven (7) days prior to the Case Management Conference that complies with the Standing Order For All Judges Of The Northern District Of California and the Standing Order of this Court. Plaintiffs shall be responsible for filing the statement as well as for arranging the conference call. All parties shall be on the line and shall call (510) 879-3550 at the above indicated date and time.

Dated: 4/23/2014

  
JUDGE, U.S. DISTRICT COURT